

August 15, 2022

**VIA ECF**

The Honorable Rachel P. Kovner  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:     *Campos v. Kijakazi*, Case No. 21-cv-05143 (RPK)(VMS)**

Dear Judge Kovner,

We write on behalf of Plaintiffs and Defendant (collectively, “the Parties”) in the above-referenced action to provide the Court with a joint status report pursuant to Your Honor’s Order dated July 18, 2022.

Since the last report, on July 19, Plaintiffs provided Defendant with a written counter proposal that included clarification questions regarding Defendant’s current settlement offer. On August 10, 2022, Defendant provided Plaintiffs with a written response to the questions. On August 12, 2022, the Parties held a teleconference to discuss Defendant’s responses, wherein Plaintiffs sought greater clarity and specifics regarding the proposal. The Parties continue to believe that pursuing further settlement discussions would be worthwhile and have agreed as follows:

- Defendant will provide a written response regarding Plaintiffs’ August 12 questions no later than September 7, 2022;
- The Parties agree to schedule a call at mutually-convenient times, including staff in the Agency’s Office of Program Law, to discuss settlement status on or before September 9, 2022.

In view of the above, we respectfully request that the Parties provide a further status report to the Court by September 12, 2022 to apprise the Court of the status of the ongoing settlement discussions, and that, pending that status update, the oral argument on the preliminary injunction motion continue to be adjourned *sine die*. If at the time of the joint status report the Parties believe that oral argument on the motion will be necessary, they can advise the Court about their availability.

# Arnold & Porter

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We are happy to provide additional information to the Court, if helpful. The Parties thank the Court for its ongoing assistance in this matter.

Respectfully submitted,

*/s/ Carmela T. Romeo*  
Carmela T. Romeo